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DATE FILED: 3/30/8

March 29, 2021

BY ECF

The Honorable Kimba M. Wood United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007 MEMO ENDORSED

Re: United States v. Abreu Gil et al; 20 Cr. 199 (KMW)

Dear Judge Wood:

I represent Nelson Diaz (Abdul Alamin) in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A on February 14, 2020. I write, without objection from the Government or Pretrial Services, to respectfully request a modification of Mr. Alamin's bail conditions. Specifically, I request that the location monitoring (GPS) condition be lifted from April 3, 2021 until April 5, 2021.

As the Court is aware, Mr. Alamin suffers from a variety of medical conditions. He has several medical appointments scheduled each month. On Saturday, April 3, 2021, Mr. Alamin has a scheduled MRI. To perform the MRI, his ankle bracelet must be removed. After conferring with Pretrial Services Officer Erin Cunningham, on April 3, 2021, Mr. Alamin will travel from his residence to the clinic where the MRI will be performed. At the clinic, his ankle bracelet will be removed by staff and be retained by Mr. Alamin. He will return directly to his residence. Since Pretrial Services is not open on weekends, Mr. Alamin will travel to the courthouse in the morning on Monday, April 5, 2021 to have the ankle bracelet put back on.

Accordingly, we respectfully request that the Court modify Mr. Alamin's bail conditions, lifting the condition of location monitoring (GPS) from April 3, 2021 until April 5, 2021.

Thank you for your consideration.

SO ORDERED: N.Y., N.Y. 330 2

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